

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DeAndre Crawford,

Plaintiff,

v.

Charles Best, et al.

Defendants.

Case Number 1:18-cv-4882

Judge Mary M. Rowland

DECLARATION OF SAMUEL P. MYLER

I, Samuel P. Myler, submit this declaration in support of Plaintiff DeAndre Crawford's opposition to the Motion for Summary Judgment filed by defendants Lidia Diaz, R.N., Evaristo Aguinaldo, M.D., and Saleh Obaisi, M.D. (collectively, the "Wexford Defendants"). I have personal knowledge of the facts set forth herein, except where otherwise noted, and would testify to such facts if called as a witness.

1. Attached hereto as **Exhibit 1** is a true and correct copy of the Verified Complaint filed by plaintiff DeAndre Crawford in the instant case.

2. Attached hereto as **Exhibit 2** is a true and correct copy of the Declaration of DeAndre Crawford.

3. Attached hereto as **Exhibit 3** is a true and correct copy of the August 19, 2020 Deposition of DeAndre Crawford.

4. Attached hereto as **Exhibit 4** are true and correct copies of Plaintiff's grievances related to the removal of his mattress and the Wexford Defendants' failure to provide him medical treatment.

5. Attached hereto as **Exhibit 5** are relevant excerpts from Plaintiff's medical records produced by IDOC in response to Plaintiff's discovery requests in this case.

6. Attached hereto as **Exhibit 6** is the Expert Report of Vincent Cannestra, M.D. dated April 19, 2021.

7. Attached hereto as **Exhibit 7** is a true and correct copy of the June 2, 2021 Deposition of Vincent Cannestra, M.D.

8. Attached hereto as **Exhibit 8** are relevant excerpts from the October 14, 2021 Deposition of Maurice Lake.

9. Attached hereto as **Exhibit 9** is the Report of Consultation prepared by Chadwick C. Prodromos, M.D.

10. Attached hereto as **Exhibit 10** are relevant excerpts from the September 2, 2021 Deposition of Chadwick C. Prodromos, M.D.

11. Attached hereto as **Exhibit 11** are relevant excerpts from the October 22, 2020 Deposition of Lidia Diaz.

March 7, 2022

Respectfully submitted,

/s/ Samuel P. Myler

Mark McLaughlin

Marc R. Kadish

Samuel P. Myler

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CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2022, a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will provide notice of filing to all counsel of record

/s/ Samuel P. Myler

Attorney for Plaintiff